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JANET NAPOLITANO, GOVERNOR
SUSAN GERARD, DIRECTOR

FAX TRANSMITTAL SHEET

DATE: May 15, 2006

TO: Laboratory Director and QA Manager

FROM: Steven D. Baker, Office Chief
Laboratory Services
State Laboratory Services

Subject: Information Update #89

PAGES: 6 (including cover)

NOTE: If any of the pages are missing, please call 1-800-952-0374, (602) 364-0734 or (602) 364-0733.

THIS MESSAGE AVAILABLE IN ALTERNATIVE FORMAT UPON REQUEST, BY CONTACTING: Prabha Acharya AT (602) 364-0734.

Leadership for a Healthy Arizona

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Information Update

May 15, 2006
Update #89

1. **Clarification:** **In the Information Update #88, we forgot to mention that the specified EPA contacts in Cincinnati, were for DRINKING WATER questions only.**

   Cincinnati contacts:
   - **Jennifer Best (513-569-7012) is the Micro Lead and is responsible for regulatory and technical questions for micro**
   - **Michella Karapondo (513-569-7141) is the contact for Radiochemistry and for regulatory questions on chemistry**
   - **Judy Brisbin (513-569-7883) is responsible for methods questions for chemistry.**

2. **ADHS Revising Rules for Environmental Laboratory Licensure**

   ADHS is working on revising the rules for environmental laboratory licensure, 9 A.A.C. 14, Article 6. ADHS has formed an Environmental Laboratories Rulemaking Work Group to provide input on the rulemaking and held the first Work Group meeting on May 10, 2006.

   After the Department works through the draft rules with the Work Group, the Department will present the draft rules to the Environmental Laboratory Advisory Committee (ELAC), authorized under A.R.S. § 36-495.16, to obtain ELAC's recommendations.

   The draft rules and Work Group meeting information are available on the ADHS website at http://www.azdhs.gov/diro/admin_rules/envlabs.htm
   Anyone interested in commenting on the draft rules may attend the Work Group meetings or submit written comments to Sarah Harpring, Rules Analyst, as follows:
   E-mail: harpris@azdhs.gov
   Fax: 602-364-1150
   Mail: ADHS Office of Administrative Rules
   1740 W. Adams St., Suite 202
   Phoenix, AZ 85007

3. **There is now a new "Search the State Lab website" option on the ADHS website: http://www.azdhs.gov/lab/index.htm. This search engine will only search pages within the State Lab website and therefore will have fewer hits. This is a good tool to search the past Information Updates, Licensure program's rules, various policies, audit check sheets, and so on.**

4. **Collision cell for 200.8 in wastewater:** **We were informed by EPA recently that the use of a collision cell is allowed in waste water testing because it overcomes interference. The usual conditions apply; i.e., all QC tests must be performed and all QC acceptance criteria must be met with the collision cell as an integral part of the method.**

EPA's Office of Ground Water and Drinking Water is considering allowance for use of the collision cell but a decision has not yet been made. So, at present, the allowance applies to wastewater only.

5. **Desorb time for volatile analysis in wastewater:** **We were informed by EPA recently that ADHS could allow alteration of purge-and-trap conditions and materials in wastewater methods for determination of organic volatiles if some conditions are met. EPA's concern about altering purge-and-trap conditions and materials is that if samples are analyzed by internal standard only, a decrease in recovery will be compensated by the internal standard and will, therefore, not be detectable. Therefore, any change in purge-and-trap conditions and materials should be tested using the external standard technique. EPA provided a set of tests for evaluating purge-and-trap performance in Section 7 of EPA Method 1624. These tests, or similar tests, should be performed to demonstrate good recovery of the analytes under altered purge-and-trap conditions. After good recovery is demonstrated, the initial precision and recovery tests and other QC tests required by the method should be performed using the internal or external standard technique specified in the method. The alternate purge-and-trap conditions and/or materials can be used if all tests are performed and all QC acceptance criteria are met.**

6. **Desorb time for volatile analysis in drinking water:** **In the past ADHS has allowed an alternate desorb time for 524.2 due to a less stringent language in the method. As a result of recent communications with EPA, it has come to our attention that drinking water program of EPA is very adamant about the 4 minute desorb time due to the reason given in the above wastewater item #5. The labs should follow EPA's criteria specified in 524.2. The labs will have to repeat MDL and IDOC studies with the new desorb times as prescribed in the reference method before running compliance samples.**

7. **Please make a note; Konelab analyzer is not approved for drinking water compliance testing.**

8. **Reminder:** **The labs must have all the items, requested in the preaudit agenda, ready before the on-site audit begins, for an efficient review of data by the surveyors. If a lab fails to comply with the above requirement, the subsequent audit will either be scheduled for a longer duration or the copies of all requested items would be required to be sent to our office.**

9. **When a compliance testing is performed by a method that is a) not in the licensure rules, b) not promulgated by EPA, or c) analyte is not part of the method compound list, one of the appropriate data qualifier must be used in the final report. Suggested flags are listed below:**

T1 = Method approved by EPA, but not yet licensed by ADHS.

T2 = Cited ADHS licensed method does not contain this analyte as part of method compound list.

T3 = Method not promulgated either by EPA or ADHS.

10. **EPA 524.2-** **A summary of communication with EPA Cincinnati for your information:**

- **Tune should be run at less than 25 ng on column.**
- **It is allowable to evaluate BFB in CCV.**
- **Calibration standards and QC samples must be analyzed at pH<2, regardless of type of water.**
- **LRB must be analyzed at pH<2 also.**

11. <u>Some helpful pointers on 552.2, from EPA Cincinnati:</u>

Method 552.3 has different columns and surrogates suggested. The link to the method is at www.epa.gov/safewater/methods/methods.html

DB 1701 30m X 0.25 mm X 0.25 um primary column
DB 5.625 30 m X 0.25mm X 0.25 um for confirmation.

It is not permitted to buy pre-methylated standards. The derivitization reaction in that method is not complete for several analytes, therefore, it is essential that the lab "correct" for their level of derivitization by methylating their own standards. If the pre-methylated standards are used, the lab would under report the compounds in their samples.

12. <u>Reminder:</u> If there is a change in the laboratory name, directorship or ownership or an appointment of an acting laboratory director, the license automatically expires unless within twenty business days after the change the department is notified in writing of the change and an application for a new license is submitted to the department.

13. <u>Laboratory use of Freon:</u> In the Information Update 87, we had the following information:

<u>"Methods' Update from EPA:</u>
Freon, regardless of source or date manufactured, cannot be used for the uses specified at 40 CFR 82.13, appendix G, including determination of oil and grease, and TPH, in wastewater. In the April 6, 2004 method update, EPA proposed to withdraw Freon-based methods. That rule is scheduled to go final some time this summer. After the rule is published, there will be no approved Freon-based methods at part 136.

The laboratories must switch over to 1664A from the Freon based methods."

The above information still holds; the method update rule is projected to go into effect in a couple of weeks. Once the rule goes into effect, the laboratories can no longer use Freon based methods.

The general exemption for Freon use is not applicable for testing of oil and grease, and total petroleum hydrocarbons in water. This information can be found in the following publications:

40 CFR part 82, subpart A, APPENDIX G and Federal Register / Vol. 70, No. 249 / Thursday, December 29, 2005 / Rules and Regulations.

14. **Clarification regarding duplicate analyses for microbiological samples:**
    - **The laboratory must perform duplicates at a 5% frequency of quantifiable micro methods that reference Standard Methods. At minimum one duplicate per month must be performed if less than 20 samples are analyzed per month.**
    - **The sample received must be >200 mls and split into two 100 ml samples; cannot split a 100 ml sample into two 50 ml samples. The samples must have at least 2.5 cm of air space so that they can be shook vigorously 25X before splitting. The laboratory may use field duplicates samples which are at >100 mls.**

15. **Director approved method: The Director of ADHS has approved "EPA manual 821-R-02-012 for Acute Toxicity in Wastewater".**

16 **Training Survey: There is a training survey attached to this Update to get your input on the workshop topics. A quick response would be appreciated.**

17. **Please contact Prabha Acharya @ (602) 364-0734 or acharyp@azdhs.gov for any technical or method related questions. The earlier Information Updates can be accessed @ http://www.azdhs.gov/lab/license/tech/infoup.htm**

Request for your input on Laboratory Training Topics:

In an ongoing effort to provide training topics of interest to the Arizona Laboratory community, we are discussing the option of offering fee based instruction through a training vendor who specializes in laboratory related topics. We would like to ask for your feedback on the following topics, specifically pertaining to your interest level and ability/desire to attend.

Information about the vendor and the coursework can be found online at:
http://www.accta.com/onsite.html

The proposed topics at this time include the following 1/2 day sessions. Any two can be combined into a full day session. If you prefer full day session what combination you would like and the number of people interested in attending;

1 Integrating Chromatographic Peaks (1/2 day)

 # people would like to attend _____

2. Analytical Calibration Techniques (1/2 day)

 # people would like to attend _____

3. Practical Laboratory Statistics (1/2 day)

 # people would like to attend _____

4. A full day seminar; # people would like to attend _____

What combination would you prefer? _____

The cost (per person) for the class is projected to be:

1/2 Day seminar: $160/person (assuming a minimum class of 20)
Full Day seminar: $280/person (assuming a minimum class of 20)

Students could register for either a single half a day topic, or two half day (i.e., full day) topics.

If you find other topics of interest at this site, please list them below.

1.

2.

Please fax your response to 602.364.0759 to the attention of Joe Harmon. Thanks, we appreciate your help.